BRYAN SCHRODER United States Attorney

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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,) No. 1:21-cr-00002-TMB-MMS
Plaintiff,)) <u>COUNT 1</u> :) WIRE FRAUD
VS.) Vio. of 18 U.S.C. § 1343
RIYAN THOMAS ELLIOT STOSSEL,)))
Defendant.)))

<u>INFORMATION</u>

The United States Attorney charges that:

1. RIYAN THOMAS ELLIOT STOSSEL made 108 fraudulent electronic bank transfers for \$11,503.00 from the bank account of his former employer, Haines Hammer Museum, by utilizing their Pay Pal account to take funds from the Haines Hammer Museum bank account, into STOSSEL's and another individual's accounts.

THE SCHEME

2. From on or about December 3, 2019, to on or about March 31, 2020, in or near Haines, Alaska, the defendant, RIYAN THOMAS ELLIOT STOSSEL, participated in and intended to devise a scheme to defraud his former employer, Haines Hammer Museum, to obtain money and property by means of materially false and fraudulent pretenses, representations and promises.

MANNER AND MEANS

It was part of the scheme that:

- 3. Prior to September 2019, STOSSEL was employed as the Director of the Haines Hammer Museum (Museum). STOSSEL's duties included managing the books for the Museum, responding to emails, and setting up and controlling the Museum's Pay Pal account that linked the Museum's bank account with their Pay Pal account.
- 4. In September 2019, STOSSEL resigned as the Director of Haines Hammer Museum. STOSSEL continued to have unauthorized electronic access to the Museum's bank account via the Museum's Pay Pal account. On December 3, 2019, STOSSEL with the intent to defraud, began to make material misrepresentations using the Museum's Pay Pal account to access Museum's bank account in order to repeatedly make unauthorized fund transfers from Museum's bank account into STOSSEL's and other individual's Pay Pal accounts continuing up and until March 31, 2020.
- 5. Between December 3, 2019 and March 31, 2020, STOSSEL conducted 108 unauthorized wire transfers from Haines Hammer Museum bank account by making repeated material misrepresentations though the Museum's Pay Pal account authorizing

the transfer of the stolen funds into an accounts held and controlled by STOSSEL and another individual, for a total value of \$11,503.00.

6. On or about the dates set forth below, in or near Haines, in the District of Alaska, the defendant RIYAN THOMAS ELLIOT STOSSEL had made 108 material misrepresentation for the purpose of executing the scheme described above, and attempting to do so, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds previously described above on 108 occasions, between the dates of December 3, 2019 through March 31, 2020.

All of which is in violation of Section 1343 of Title 18 United States Code.

RESPECTFULLY submitted on this ____ day of February, 2021, at Juneau, Alaska.

BRYAN SCHRODER United States Attorney

s/ Jack S. Schmidt

JACK S. SCHMIDT

Assistant United States Attorney
United States of America